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November 2, 2016

**Via ECF & Email**

The Honorable Cathy Seibel  
United States District Court Judge  
Charles L. Briant United States Courthouse  
300 Quarropas Street  
White Plains, New York 10601

**Re: Corey Marrow v. The City of Mount Vernon, et al.  
Docket No.: 14 Civ. 5473 (CS)(JCM)**

Dear Judge Seibel:

Please be advised that we have just been retained by The City of Mount Vernon to take over the handling of the above-referenced matter.

In light of the foregoing, we would respectfully request an extension of time to allow us to obtain the file materials, familiarize ourselves with the case and comply with all outstanding discovery demands.

Specifically, we would ask for a thirty (30) day extension of time to respond to all discovery requests and interrogatories – the existing deadline is tomorrow - 11/3/16.

While we understand that there have been several prior requests, all of which have been granted, this is our first such request. Unfortunately, plaintiff's counsel will not consent to our request. He did not give a reason for his denial other than to say he would file a letter in opposition.

We would respectfully propose the following "Revised Scheduling Order":

1. Response to discovery requests/interrogatories by 12/2/16;
2. Depositions to be completed by 12/9/16 at 12:00pm;
3. Pre-motion conference will be held on 12/16/16<sup>1</sup> at 12:00 p.m.;
4. Pre-motion letters are due by 12/7/16; and
5. Opposition to pre-motion letters is due by 12/14/16.

As you will notice, our request for an extension of time will not impact any of the other previously scheduled dates.

<sup>1</sup> The existing date for the pre-motion conference on the Docket is 12/17/16 which is a Saturday.

Thank you for your time and attention to this matter.

Respectfully submitted,

*Andrew C. Quinn*

Andrew C. Quinn, Esq.

ACQ/jg

cc: David A. Thompson, Esq. (*via ECF*)